REMARKS

Claims 1-12, 15, 18, 19 and 22 remain pending in the application.

The Applicants respectfully request the Examiner to reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

Claims 1-7, 9, 10, 12, 15, 18, 19 and 22 over Suyama in view of Fernandez

In the Office Action, claims 1-7, 9, 10, 12, 15, 18, 19 and 22 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Suyama et al., U.S. Patent No. 5,561,331 ("Suyama") in view of Fernandez et al., U.S. Patent No. 6,184,651 ("Fernandez"). The Applicants respectfully traverse the rejection.

Claims 1-7, 9, 10, 12 and 15 recite, *inter alia,* a key chain rechargeable device that is adapted to be inductively recharged from an external power source when a key associated with a key securing structure is inserted in a lock device. Claim 18 recites, *inter alia*, an inductive charging coil placed proximate to a vehicle ignition assembly adapted to provide battery charging power to a key chain rechargeable device. Claims 19 and 22 recite, *inter alia*, inductive coupling a rechargeable battery of a key chain electronic device to an external power source associated with a lock device when a key is in the lock device.

Suyama appears to disclose an ignition key device for use with a motor vehicle and a remote unit which is capable of remotely locking and unlocking a door of the motor vehicle (Abstract). A secondary cell is accommodated in the ignition key (Suyama, Fig. 1, item 3). When the ignition key is inserted into an ignition switch lock of the motor vehicle, the secondary cell is charged by a storage battery of the motor vehicle (Suyama, col. 3, lines 24-32). Two charging terminals connect an ignition key to the motor vehicle for charging (Suyama, col. 5, lines 3-15).

The Office Action correctly acknowledges that Suyama fails to disclose inductive charging of a rechargeable device having a battery therein (Office Action, page 5). The Office Action relies on Fernandez to allegedly make

up for the deficiencies in Suyama to arrive at the claimed invention. The Applicants respectfully disagree.

Fernandez appears to disclose a contactless charging system transferring charging energy to charge a battery of a portable device, such as a portable motorized toothbrush, a two-way RF radios, a cellular phone, a paging device, or a wireless communicator (Fernandez, Abstract). The inductive coupler also provides a way for communicating at least one signal, such as a way to improve the charging process and the transfer of charging energy (Fernandez, col. 6, lines 12-34).

Fernandez discloses an improved induction charging system. The application of the improved charging system is to portable devices, such as a portable motorized toothbrush, a two-way RF radios, a cellular phone, a paging device, and a wireless communicator. Fernandez fails to disclose or suggest a key securing structure, a lock device and a vehicle ignition assembly, as recited by claims 1-7, 9, 10, 12, 15, 18, 19 and 22.

Moreover, the examiner alleges that it would have been obvious at the time of the invention to modify Suyama with Fernandez to arrive at the claimed invention. However, modifying Suyama with an inductive charging system would result in Suyama having two charging systems for a single device, which is **nonsensical**.

"Teachings of references can be combined only if there is some suggestion or incentive to do so." In re Fine, 5 USPQ2d 1596,1600 (Fed. Cir. 1988) (quoting ACS Hosp. Sys. v. Montefiore Hosp., 221 USPQ 929, 933 (Fed. Cir. 1984)) (emphasis in original). Suyama fails to suggest substituting its contact charging system with an inductive charging system. Fernandez fails to suggest use of inductive charging associated with a key securing structure, a lock device and a vehicle ignition assembly, as recited by claims 1-7, 9, 10, 12, 15, 18, 19 and 22.

The piecemeal application of Suyama et al. is improper: the reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention (see MPEP 2141.02 at page

2100-95 (Rev. 1, Feb. 2000) (citing W.L. Gore & Associates, Inc. v. Garlock, Inc., 22 USPQ 303 (Fed. Cir. 1983), cert. denied, 469 U.S. 851 (1984))). Suyama's charging system relies on forces produced by physical connection of connectors used to charge the ignition key in keeping the ignition key and a remote unit coupled together (see col. 6, lines 44-49). Thus, Suyama teaches away from use of induction charging since the lack of contacts would be detrimental to holding the ignition key and the remote unit coupled together.

Accordingly, for at least all the above reasons, claims 1-7, 9, 10, 15, 19 and 22 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claim 8 over Suyama in view of Fernandez and Hansson

In the Office Action, claim 8 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Suyama in view of Fernandez, and further in view of Hansson, U.S. Patent No. 6,323,775 ("Hansson"). The Applicants respectfully traverse the rejection.

Claim 8 is dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claim 8 recites, *inter alia,* a key chain rechargeable device that is adapted to be inductively recharged from an external power source when a key associated with a key securing structure is inserted in a lock device.

As discussed above, Suyama in view of Fernandez fails to disclose or suggest a key chain rechargeable device that is recharged from an external power source when a key associated with a key securing structure is inserted in a lock device, as recited by claim 8.

The Office Action relies on Hansson to allegedly make up for the deficiencies in Suyama in view of Fernandez to arrive at the claimed invention. The Applicants respectfully disagrees.

Hansson appears to disclose an apparatus, system and method that notifies a user of a low battery condition when a remaining battery capacity of a portable electronic device falls below a predetermined level (Abstract). A

location for charging the electronic device is monitored by using GPS, GSM short range radio interface, and Bluetooth (Hansson, Abstract).

Hansson is relied on to disclose notification of a low battery condition when in proximity of a charging unit. Hansson fails to even mention use of an inductive charging system, much less a key chain rechargeable device that is inductively recharged from an external power source when a key associated with a key securing structure is inserted in a lock device, as recited by claim 8.

Neither Suyama nor Hansson, either alone or in combination, disclose, teach or suggest a key chain rechargeable device that is inductively recharged from an external power source when a key associated with a key securing structure is inserted in a lock device, as recited by claim 8.

Accordingly, for at least all the above reasons, claim 8 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claim 11 over Suyama in view of Fernandez and Holcomb

In the Office Action, claim 11 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Suyama in view of Holcomb et al., U.S. Patent No. 3,855,534 ("Holcomb"). The Applicants respectfully traverse the rejection.

Claim 11 is dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claim 11 recites, *inter alia,* a key chain rechargeable device that is inductively recharged from an external power source when a key associated with a key securing structure is inserted in a lock device, with the key chain rechargeable device being a penlight.

The Office Action correctly acknowledged that Suyama fails to disclose a key chain rechargeable device is a penlight device (Office Action, page 9). The Office Action relies on Holcomb to allegedly make up for the deficiencies in Suyama in view of Fernandez to arrive at the claimed invention. The Applicants respectfully disagrees.

Holcomb appears to disclose a method and apparatus for providing power to portable radio transmitters (Abstract). A special clip arrangement is build into the base of a transmitter itself for connection of a penlight cell (Holcomb, col. 1, lines 3-11).

Holcomb discloses use of small batteries, e.g., penlight type battery cells. Holcomb fails to disclose or suggest use of a penlight, much less a key chain rechargeable device that is inductively recharged from an external power source when a key associated with a key securing structure is inserted in a lock device, with the key chain rechargeable device being a penlight, as recited by claim 11.

Neither Suyama nor Holcomb, either alone or in combination, disclose, teach or suggest a key chain rechargeable device that is inductively recharged from an external power source when a key associated with a key securing structure is inserted in a lock device, much less with the key chain rechargeable device being a penlight, as recited by claim 11.

Accordingly, for at least all the above reasons, claim 11 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,
MANELLI DENISON & SELTER PLLC

William H. Bollman
Reg. No.: 36,457
Tel. (202) 261-1020
Fax. (202) 887-0336

2000 M Street, N.W. 7th Floor
Washington D.C. 20036-3307

WHB/df